

**WANG, HARTMANN & GIBBS, P.C.**

A Professional Law Corporation  
Richard F. Cauley (SBN: 109194)  
Michelle M. McCliman (SBN: 191241)  
1301 Dove Street, Suite 1050  
Newport Beach, CA 92660  
Telephone: (949) 833-8483  
Facsimile: (949) 833-2281

Attorneys for Plaintiff Mei-Fang Wang

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

MEI-FANG WANG, an individual,

Plaintiff,

vs.

CHIUNG YEN CHI, an individual;  
CHIN CHAN CHI, an individual; and  
DOES 1 through 50, inclusive,

Defendants.

Case No. SC06-03472 SBA

**STIPULATION AND ~~PROPOSED~~  
ORDER RE STAY OF  
PROCEEDINGS DURING  
SETTLEMENT NEGOTIATIONS**

**STIPULATION**

IT IS HEREBY STIPULATED by and between Plaintiff MEI-FANG WANG, ("Plaintiff") and Defendants CHIUNG YEN CHI and CHIN CHAN CHI (collectively, "Defendants") who have appeared in the above-entitled-action that:

- The parties have essentially reached a settlement of this Action.
- Due to scheduling conflicts between the parties and the fact that Plaintiff is currently out of the country, the parties agree to stay this

1 Action for one month to allow the parties to finalize the settlement  
2 and dismiss this Action.

- 3 • The case is dismissed with prejudice, however, if any party hereto  
4 shall certify to this court, within thirty (30) days, with proof of  
5 service of a copy thereof, that the agreed consideration for said  
6 settlement has not been delivered over, the foregoing order shall  
7 stand vacated and this cause shall forthwith be restored to the  
8 calendar to be set for trial.

9  
10 Dated: 20 Mar, 2007

WANG, HARTMANN & GIBBS  
A Professional Law Corporation

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13 By: 

Richard F. Cauley  
Michelle M. McCliman  
Attorneys for Plaintiff

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16  
17 Dated: 3.20, 2007

PILLSBURY WINTHROP SHAW  
PITMAN, LLP

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20 By: 

Vernon H. Granneman  
Attorney for Defendants

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26 **ORDER**

27 Based upon the Stipulation of the parties who have appeared in the above-  
28 entitled Action,

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2 IT IS HEREBY ORDERED:

3 ~~XXXX The above proceedings are hereby stayed for thirty (30) days from~~  
4 ~~the date of this Order. SBA~~

5 2. The case is dismissed with prejudice, however, if any party hereto  
6 shall certify to this court, within thirty (30) days, with proof of service of a copy  
7 thereof, that the agreed consideration for said settlement has not been delivered  
8 over, the foregoing order shall stand vacated and this cause shall fall forthwith be  
9 restored to the calendar to be set for trial.

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13 IT IS SO ORDERED.

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15 Dated: MARCH 22, 2007

16   
17 Sandra Brown Armstrong  
18 United States District Judge  
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**PROOF OF SERVICE** [CCP 1013A(3)]

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed in the County of Orange, State of California, am over the age of eighteen (18), and not a party to the within action. My business address is: 1301 Dove Street, Suite 1050, Newport Beach, California 92660.

On March 20, 2007 I served the foregoing document, described as

**STIPULATION AND [PROPOSED] ORDER RE STAY OF PROCEEDING  
DURING SETTLEMENT NEGOTIATIONS**

on the interested parties in this action

XXX by placing the true copies thereof (or the original where required by law) enclosed in sealed envelopes addressed as follows:

Vernon H. Granneman  
Pillsbury Winthrop Shaw Pittman, LLC  
2475 Hanover Street  
Palo Alto, CA 94304


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XXX BY U.S. MAIL - I caused such envelope to be deposited in the United States Mail, First Class Postage Prepaid at Newport Beach, California on March 20, 2007.

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. It is deposited with the United States Postal Service on that same day, in the ordinary course of business. I am aware that on motion of the parties served, service is presumed invalid if the postal cancellation date, or postage meter date, is more than one day after the date of deposit for mailing in the affidavit.

XXX I declare that I am employed in the office of a member of the Bar of this Court, at whose discretion the service was made.

XXX I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed on March 20, 2007, at Newport Beach, California.

  
Kelly Floyd